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19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 UNITED STATES OF AMERICA *ex rel.*  
 22 PEGGY THORNTON, Relator,

23 and

24 PEGGY THORNTON,

25 Plaintiff,

26 vs.

27 PORTOLA DEL SOL OPERATOR, LLC, a  
 28 foreign limited-liability company; TMIF II  
 PORTOLA, LLC, a foreign limited-liability  
 company; APARTMENT MANAGEMENT  
 CONSULTANTS, LLC, a foreign limited  
 liability company; and RENE  
 RICHARDSON, as AGENT of PORTOLA  
 DEL SOL OPERATOR, LLC,

29 Defendants.

30 Case No. 2:21-cv-01123-APG-BNW

31 **Stipulation and Order to Extend Deadline  
 32 for Plaintiff Peggy Thornton and  
 33 Defendants Apartment Management  
 34 Consultants, LLC and Rene Richardson to  
 35 submit Reply supporting their Joint  
 36 Motion to Approve Settlement and  
 37 Distribution of Settlement Funds  
 38 [ECF No. 124]**

39 **(Fourth Request)**

1           Defendants Apartment Management Consultants, LLC and Rene Richardson (collectively  
 2 “AMC”); Defendant TMIF II Portola, LLC (“TMIF”); Plaintiff-Relator Peggy Thornton; and  
 3 Real Party in Interest the United States of America, by and through their respective undersigned  
 4 counsel, hereby stipulate to extend Ms. Thornton and AMC’s deadline to submit their reply in  
 5 support of their joint motion to approve settlement and distribution of settlement funds (“Joint  
 6 Motion”) by 30 days until **May 1, 2025**, with the following background and reasons:

7           1.       Ms. Thornton and AMC submitted the Joint Motion (ECF No. 124) on January 8,  
 8 2025.

9           2.       As explained in the Joint Motion, Ms. Thornton and AMC have agreed on a  
 10 settlement amount to resolve claims against the latter but required Court approval given that the  
 11 United States had not stated whether it had any objection to the settlement terms.

12           3.       The United States subsequently filed a partial objection to the Joint Motion, stating  
 13 that it does *not* ultimately object to settlement or the settlement amount but requires any  
 14 settlement to conform to its specifications, including distribution of settlement funds directly to  
 15 the United States. ECF No. 128.

16           4.       The United States, Ms. Thornton, and AMC have since conferred and agreed to  
 17 jointly work on a written settlement agreement based on the Government’s specifications.

18           5.       Because the settlement agreement will moot the need for the Court to approve the  
 19 settlement and to accommodate the time needed to complete that agreement, the United States,  
 20 Ms. Thornton, and AMC stipulated to extend the time for Ms. Thornton and AMC to reply to the  
 21 Joint Motion to February 20, 2025. ECF Nos. 131-32.

22           6.       Shortly after the Court approved that stipulation, TMIF submitted its own “limited  
 23 opposition” to the Joint Motion. ECF No. 133.

24           7.       To likewise accommodate drafting the settlement agreement, Ms. Thornton, AMC,  
 25 and TMIF stipulated to extend Ms. Thornton and AMC’s reply deadline (with respect to TMIF’s  
 26 limited opposition) to February 20, 2025 – thus aligning with the deadline as to the Government’s  
 27 limited objection. ECF No. 134-35.

28

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1       8.     The Government circulated a proposed settlement agreement shortly thereafter,  
 2 and prior to the last stipulated extension (ECF Nos. 138–39), AMC provided the Government  
 3 with requested edits to the settlement agreement.

4       **9.     Due to current staffing constraints, the Government has requested additional  
 5 time to reconcile those edits and to finalize the settlement agreement.**

6       10.    Accordingly, all parties and the United States agree to extend AMC and  
 7 Ms. Thornton's deadline to file a reply in support of the Joint Motion until May 1, 2025.

8       11.    Ms. Thornton, AMC, TMIF, and the United States agree that this stipulation is  
 9 entered into in good faith and will not unduly delay proceedings.

10      **IT IS SO STIPULATED.**

11      Dated: April 1, 2025

12      SNELL & WILMER L.L.P.

13      By: /s/ Gil Kahn

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15           *Attorneys for Defendant Apartment  
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16      Dated: April 1, 2025

17      U.S. ATTORNEY'S OFFICE  
 FOR THE DISTRICT OF NEVADA

18      By: /s/ Christian R. Ruiz

19           Sue Fahami  
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20           *Attorneys for Real Party in Interest  
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21      Dated: April 1, 2025

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25           *Attorneys for Relator*

26      Dated: April 1, 2025

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## ORDER

Good cause appearing, Ms. Thornton and AMC's stipulation is **GRANTED**. Ms. Thornton and AMC's deadline to submit a reply in support of their Joint Motion (ECF No. 124), with respect to both the United States' partial objection (ECF No. 128) and TMIF's limited opposition (ECF No. 133), is extended to and including May 1, 2025.

## **IT IS SO ORDERED.**

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## CHIEF UNITED STATES DISTRICT JUDGE

DATED: April 2, 2025

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